

LEVI&KORSINSKY, LLP

55 Broadway, 10th Floor
New York, NY 10006
T: 212-363-7500
F: 212-363-7171
www.zlk.com

Adam Apton
aapton@zlk.com

February 3, 2020

VIA ELECTRONIC CASE FILING

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Courtroom 443
New York, NY 10007

Re: Berdeaux v. OneCoin Ltd., et al., Case No. 1:19-cv-04074-VEC (S.D.N.Y.)

Dear Judge Caproni:

This firm, Levi & Korsinsky, LLP, represents Lead Plaintiff Donald Berdeaux and plaintiff Christine Grablis ("Plaintiffs") in the subject action ("Action"). We write in accordance with this Court's August 23, 2019 Memo Endorsement (ECF No. 49) ordering Plaintiffs to file a letter on the first business day of each month (beginning on September 3, 2019) updating the Court on Plaintiffs' efforts to effectuate service of process upon all Defendants who had not already been served.

On August 23, 2019, in response to defendant Mark S. Scott's ("Scott") letter motion to stay the instant Action during the pendency of the criminal trial against Mr. Scott, the Court issued the Court issued an Order staying all proceedings in this Action until Plaintiffs accomplished service upon the remaining Defendants (ECF No. 49). Defendant Scott's criminal trial has since concluded and, on November 21, 2019, a Manhattan federal jury found Defendant Scott guilty on Count One: Conspiracy to Commit Money Laundering and Count Two: Conspiracy to Commit Bank Fraud.¹

On October 1, 2019, Plaintiffs filed a Motion for Leave to Effectuate Alternative Electronic Service upon Defendants OneCoin Ltd ("OneCoin"), Ruja Ignatova ("Ignatova"), Sebastian Greenwood ("Greenwood"), and Irina Andreeva Dilinska ("Dilinska") ("Plaintiffs' First Motion for Alternative Service"). On November 1, 2019, the Court denied Plaintiffs' First Motion for Alternative Service without prejudice and suggested that Plaintiffs address the concerns it raised in a renewed application.

On December 3, 2019, Plaintiffs filed their Renewed Motion for Leave to Effect Alternative Service on Defendants OneCoin, Ignatova, Greenwood, and Dilinska (the "Renewed Motion"). On January 24, 2020, the Court granted Plaintiffs' Renewed Motion as to Defendants OneCoin and Ignatova and denied the motion as to Defendants Greenwood and Dilinska (the "Alternative Service Order"). Concurrent with the filing of this letter, Plaintiffs are filing the Declaration of John

¹ Additionally, during Defendant Scott's criminal trial it was revealed that defendant Konstantin Ignatov has pleaded guilty to the criminal charges issued against him.

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A. Carriel attesting that Plaintiffs have accomplished service as to Defendants OneCoin and Ignatova as directed by the Alternative Service Order.

With respect to Defendant Greenwood, the Renewed Motion proposed submitting the Summons as to Greenwood and Amended Complaint to the prosecutor's office handling the related criminal proceedings and requesting that the documents be forwarded to Greenwood. The Alternative Service Order indicated that this proposed method of service may be sufficient "but Plaintiffs must first confirm that DOJ is willing to assist." Accordingly, on February 3, 2020, John A. Carriel, an associate with my firm, emailed two of the Assistant United States Attorneys prosecuting the related OneCoin criminal actions to inquire whether the DOJ would be willing to assist Plaintiffs in effecting service upon Defendant Greenwood by forwarding him the Summons and Amended Complaint. As of the date of this letter, we have not received a response from the DOJ.

With respect to Defendant Dilinska, the Alternative Service Order held that Plaintiffs' proposed method of service would not be granted "unless Plaintiffs can provide evidence that Dilinska has used the onecoin.eu account." Plaintiffs' counsel are conducting further research and investigation to obtain such evidence. If Plaintiffs' counsel are able to obtain direct evidence that Dilinska has used a specific email address hosted on onecoin.eu, Plaintiffs will file a renewed motion for alternative service as to Defendant Dilinska.

Plaintiffs are available at the Court's convenience to respond to any further questions as may arise.

Very truly yours,

LEVI & KORSINSKY, LLP

By: /s/ Adam Apton
Adam Apton

cc: all counsel of record (via ECF)